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July 20, 2007

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TALSO ADMITTED IN NEW JERSEY
. ALSO ADMITTED IN CONNECTICUT ALSO ADMITTED INNORTH CAROLINA

> Honorable Victor Marrero United States District Judge United States District Court Mail Room 40 Centre Street New York, New York 10007

> > Navigators Management Company a/s/o Nankai Transport v. Re:

Total Terminals International, LLC, et al. Case No:

07 Civ 5780 (VM)

Our File No.:

Carrier.

68000284

Dear Judge Marrero:

Our office represents plaintiff, Navigators Management Company, in the above referenced matter. In furtherance to Your Honor's July 18, 2007 Order, please be advised that the Summons and Complaint was sent to defendants in accordance with Fed. R. Civ. P. 4(d) on June 19, 2007. To date, defendant Hanjin Shipping is the only defendant to have waived service. Accordingly, it will be necessary for plaintiff to now effectuate formal service on the remaining defendants, Total Terminals and Lansheng Logistics Co., Ltd. With respect to the latter, as this entity is located in China, it will be necessary to serve in accordance with the Hague Convention. As Your Honor is aware, service of entities in China pursuant to the Convention may take as long as 6 months to 1 year.

In addition to the foregoing, we have now learned through preliminary discovery that there is an additional entity, COSCO Shipping, which has not been named. Accordingly, plaintiff intends

Hon. Victor Marrero July 20, 2007 page 2

to amend the complaint to include COSCO who, upon information and belief, issued the ocean bill of lading covering this shipment.

Respectfully yours,

NICOLETTI HORNIG & SWEENEY

Lawrence C. Glynn

By:

LCG/

Total Terminals International, LLC cc:

301 Hanjin Road

Long Beach, CA 90802

Hanjin Shipping Co. Ltd. (American Headquarters) 80 East Route 4 Suite 490 Paramus, New Jersey 07652

Attn: Charles Min

Lansheng Logistics Co., Ltd. Room 302 Shanghai Bund International Tower 3/F 99 Huangpu Rd Shanghai, Hongkou 200080 China

The Court acknowledges plaintiff's response to the Burt's
Order dated 7-15-07. The Clark of Court indirected to
place this case on the Court's Suspense Docket perking
completional service on defendants oversees pursuant
to the Hague Convention. Haintiff may proceed to among
the complaint to include additional defendants
SO ORDERED: as appropriate.
7-26-09
DATE VICTOR MARRERO, U.S.D.J.